

DAWN M. CICA, ESQ. (NV Bar #004565)
Telephone (702) 949-8257
Facsimile (702) 216-6208
Email: DCica@LRlaw.com
LEWIS AND ROCA LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169-5996

Counsel for Creditor San Juan Drilling Inc.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

RODEO CREEK GOLD INC., *et al.*,

Debtors.

- ☐ Affects this Debtor
☒ Affects all Debtors
☐ Affects Antler Peak Gold Inc.
☐ Affects Hollister Venture Corporation
☐ Affects Touchstone Resources Company

Chapter: 11

Jointly Administered Under
Case No. BK-13-50301-MKN

Case Nos.
BK-13-50301-MKN
BK-13-50302-MKN
BK-13-50303-MKN
BK-13-50304-MKN

**NOTICE PERFECTING,
MAINTAINING AND CONTINUING
MECHANIC'S LIEN IN LIEU OF
COMMENCEMENT OF ACTION
PURSUANT TO 11 U.S.C. § 546(b)**

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. §546(b), San Juan Drilling, Inc ("San Juan Drilling"), (the "Claimant"), by and through its attorneys, Lewis and Roca LLP, hereby provides notice to the above-captioned Debtors (the "Debtors") and all parties in interest of its intent to maintain, perfect and enforce it's mechanic's lien claims (the "Lien") over the property and improvements of the Debtors as provided by Nevada Revised Statutes ("NRS") 108 *et.seq.*

The Lien secures payment in the sum of one million, nine hundred fifty seven thousand, six hundred seventy six dollars and 15/100 cents (\$1,957,676.15), in addition to interest, attorneys fees and costs pursuant to NRS 108.237, which amounts remain due and owing to Claimant in connection with work, materials, and equipment which Claimant furnished or agreed to furnish for

1 drilling and other mining work at the Hollister Property and other Nevada Operations (as defined
2 in the Sale Motion: [DE 16], collectively, the “Property”).

3 Prior to the expiration of the earliest of the time limits described in NRS 108.226(1)
4 Claimant shall to file the Notice of Lien required by NRS 108.221 et seq. against the Property and
5 intends to maintain and continue such perfection by timely commencing an action to foreclose its
6 Liens against the Property pursuant to NRS 108.233. In lieu of commencing such an action,
7 Claimant hereby gives notice of its intent to preserve all rights as a secured creditor with respect
8 to the accomplishment, maintenance, continuation of perfection or enforcement of its Lien
9 pursuant to 11 U.S.C. § 546(b).

10 Dated April 26, 2013.

11 LEWIS AND ROCA LLP

12
13 By: /s/ Dawn M. Cica
14 DAWN M. CICA, ESQ.
15 *Attorneys for Creditor San Juan Drilling, Inc.*
16
17
18
19
20
21
22
23
24
25
26
27
28